

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



February 7, 2013

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at a Reception hosted by Orbital Sciences Corporation on February 10, 2013

On February 10, 2013, Orbital Sciences Corporation (Orbital) will host a reception at the Gainey Vineyard, a location proximate to Vandenberg Air Force Base at 3950 East Highway 246, in Santa Ynez, CA, from 6 pm to 8 pm. This event will be a pre-launch reception for all invited guests to the Landsat Data Continuity Mission (LDCM) satellite launch at Vandenberg.

Approximately 800 guests have been invited and 400 are expected to attend. Invitees include representatives of the U.S. legislative branch, state and local government organizations, industry, academia, and other Federal agencies. The cost of the event, which includes all food and refreshments, will be approximately \$36.00 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that free attendance at the above mentioned event is in the interest of the agency because it will further agency programs and operations. Attendance at this event will allow NASA attendees to exchange information regarding various NASA programs, including the uses of the data and imagery produced by LDCM in education, business, science, and government. Accordingly, NASA employees (subject to the exceptions noted below) who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect the event sponsor, such as by way of contracting duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of event for themselves and any accompanying guest.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone